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<u>REMARKS</u>

Claim 1 has been amended to overcome the rejection
under 35 U.S.C. § 103(a).

Claims 1-17 and 26-56 are pending in the application.

Applicant respectfully requests reconsideration and
examination of Claims 1-17 and 26-56 in view of the amendments
above and the arguments below.

By way of this response, Applicant has made a diligent
effort to place the claims in condition for allowance. However,
should there remain any outstanding issues that require adverse
action, it is respectfully requested that the examiner telephone
Thomas F. Lebens at (858)587-7644 so that such issues may be
resolved as expeditiously as possible.

Claim 17 stands rejected under 35 U.S.C. § 102(e) as
being anticipated by Zuberec et al., U.S. Patent No. 6,298,324
(Zuberec). Applicant traverses the rejection as follows.

The rejection errs in alleging that Zuberec discloses
the claimed second set of models. As explained in the
specification on page 15, lines 12-31, the claimed models are
context-dependent or independent phonetic models, sub word
models, or whole word models, for example, monophones, biphones,
and/or triphones that are used by the speech decoder 216 to
analyze utterances.

Zuberec's speech recognition engine (48) shown in FIG.
3 and described in column 5, lines 4-10 does not disclose
multiple sets of models for recognizing utterances. Apparently,
the rejection confuses the multiple utterances disclosed in
Zuberec with multiple sets of models. Contrary to the allegation
of the rejection, there is no mention of the claimed models by
Zuberec in column 4, lines 42+ or elsewhere. Even if one were to
speculate that one set of models for recognizing utterances is

inherent in *Zuberec*'s speech recognition engine (48), there is no basis in *Zuberec* to support the conclusion that *Zuberec* discloses the claimed second set of models.

Because *Zuberec* does not disclose the claimed second set of models, *Zuberec* does not anticipate Claim 17 under 35 U.S.C. § 102. Applicant therefore requests that the rejection be withdrawn.

Claims 1-5 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Wyard et al., "Spoken Language System - beyond prompt and response" (*Wyard*) in view of Giuliani et al., "Hands free Continuous Speech Recognition in Noisy Environment Using a Four Microphone Array (*Giuliani*).

Applicant has amended Claim 1 to overcome the rejection by including the capability of switching between different acoustic models and different grammars as described in the specification on page 14, lines 20-25. The overview of the components of a spoken language system described in *Wyard* does not include the capability of switching between different models and grammars, therefore the proposed combination of references does not arrive at the claimed invention. Because the proposed combination of references does not arrive at the claimed invention, Claim 1 is non-obvious under 35 U.S.C. § 103(a).

Because Claims 2-16 depend from and include all the limitations of Claim 1, Claims 2-16 are likewise non-obvious under 35 U.S.C. § 103(a).

Regarding the rejection of Claims 26-56, the rejection errs in characterizing Claims 26-56 as having the same content as Claims 1-17. Specifically, Claims 26-56 recite an external network system coupled to the natural language interface control system. This feature is described in the specification on page 30, lines 24 et seq. Not only is the claimed external network coupled to the natural language interface control system absent
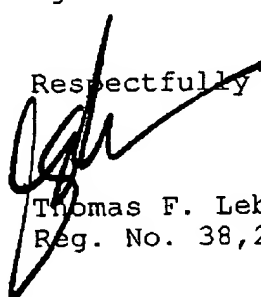
from the cited references, but also there is no motivation in the cited references to include the claimed external network in the claimed natural language interface control system. Because the cited references do not teach or suggest the claimed external network, and because there is no motivation in the references to include the claimed external network, the rejection fails to arrive at the claimed invention. Because the rejection fails to arrive at the claimed invention, Claims 26-56 are non-obvious under 35 U.S.C. § 103(a).

Applicant hereby petitions for a one month extension of time to respond to the office action. The required fee is attached to this amendment.

In view of the above, Applicant submits that Claims 1-17 and 26-56 are in condition for allowance, and prompt and favorable action is earnestly solicited.

A version with markings to show changes begins on the following page.

Respectfully submitted,

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Dated: July 19, 2002

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VERSION WITH MARKINGS TO SHOW CHANGES MADE

In the Claims:

The following like numbered claim has been replaced:

1.(amended)   A natural language interface control system for operating a plurality of devices comprising:

a 3 dimensional microphone array;

a feature extraction module coupled to the first microphone array;

a speech recognition module coupled to the first microphone array;

a speech recognition module coupled to the feature extraction module, wherein the speech recognition module utilizes hidden Markov models and can switch between different acoustic models and different grammars;

a natural language interface module coupled to the speech recognition module; and

a device interface coupled to the natural language interface module, wherein the natural language interface module is for operating a plurality of devices coupled to the device interface based upon non-prompted, open-ended natural language requests from a user.